UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KONINKLIJKE PHILIPS ELECTRONICS N.V. and U.S. PHILIPS CORPORATION,	
Plaintiffs,	
v.	Civil Action Nos.
CINRAM INTERNATIONAL INC., et al.	08 CV 00515 (RGS)
THE ADS GROUP, et al.	08 CV 04068 (RGS)
ENTERTAINMENT DISTRIBUTION COMPANY (USA) LLC, et al.	08 CV 04070 (RGS)
OPTICAL EXPERTS MANUFACTURING INC., et al.	08 CV 04071 (RGS)
Defendants.	ECF Cases

PLAINTIFFS' IDENTIFICATION OF CLAIM TERMS REQUIRING CONSTRUCTION

Pursuant to the Court's May 29, 2009 Scheduling Order, Plaintiffs Koninklijke Philips Electronics N.V. and U.S. Philips Corporation provide the following identification of claim terms/phrases requiring construction and the proposed construction of those terms.

U.S. Patent No. 5,068,846	
Claim 1	**Proposed Claim Construction**
A record carrier containing information which is readable by a beam of radiation,	
said record carrier comprising a disc shaped, radiation-transmitting substrate having a pair of planar surfaces on opposite sides thereof,	**"planar"** means relatively flat.
a non-transmissive, radiation reflecting optical structure on one of said planar surfaces of said substrate,	**"non-transmissive, radiation reflecting optical structure"** means an optical structure that reflects radiation for reading the information but does not also transmit radiation for reading the information.
said optical structure comprising a plurality of adjacent circular tracks extending about the	

U.S. Patent No. 5,068,846	
Claim 1	**Proposed Claim Construction**
center of said substrate and defining turns of a spiral or concentric circles spaced from each other in the radial direction,	
each circular track having a plurality of depressions in said one surface of said substrate, said depressions being spaced apart in the track direction by intermediate areas, and	
a reflective layer extending over said intermediate areas and said depressions	
so that upon illumination by a convergent beam of radiation which is projected on and enters through the other of said planar surfaces and which passes through said substrate and is focussed on said optical structure to a spot of a size of the order of the smallest detail of said optical structure,	
the radiation is modulated by said depressions and intermediate areas in accordance with the sequence thereof and the modulated radiation is reflected by said reflective layer towards and exits through said other planar surface,	
said substrate defining a substantially rigid support for said optical structure and having a thickness such that in the plane of said other surface, which forms the entrance and exit faces for the radiation, the diameter of the beam is sufficiently larger than the diameter of said spot so that dust particles, scratches and the like on said other surface, do not interfere with readout of information by the convergent beam focussed to said spot on said optical structure, and	
an additional layer secured to the side of said substrate remote from said other surface, said optical structure being disposed between said substrate and said additional layer so that it is protected from damage during handling.	

U.S. Patent No. 5,068,846	
Claim 2	**Proposed Claim Construction**
The record carrier according to claim 1 wherein said depressions are pressed into said one surface of said substrate and said reflective layer is metallic and is deposited on said one surface.	

U.S. Patent No. 5,068,846	
Claim 3	**Proposed Claim Construction**
The record carrier according to claim 1 or 2 wherein the thickness of said additional layer is substantially smaller than the thickness of said substrate.	

U.S. Patent No. 5,068,846	
Claim 4	**Proposed Claim Construction**
The record carrier according to claim 2 wherein said reflective, metallic layer is deposited on said one surface from vapour.	

U.S. Patent No. 5,068,846	
Claim 5	**Proposed Claim Construction**
The record carrier according to claim 4 wherein said additional layer is a layer of lacquer sprayed on said optical structure.	

Date: August 28, 2009

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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2009, a copy of the foregoing **PLAINTIFFS' IDENTIFICATION OF CLAIM TERMS REQUIRING CONSTRUCTION** was served by email on the following attorneys for Defendants, addressed as follows:

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